

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BRITISH TELECOMMUNICATIONS PLC
and BT AMERICAS, INC.,

Plaintiffs,

V.

PALO ALTO NETWORKS, INC.,

Defendant.

)
)
)
)
)
)
)
)
)
)

C. A. No. 22-1538-CJB

JURY TRIAL DEMANDED

**DECLARATION OF ANDREW GROSS
IN OPPOSITION TO DEFENDANT'S MOTION TO TRANSFER VENUE**

I, Andrew Gross, declare as follows:

1. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.
2. I was hired by Counterpane Internet Security, Inc. ("Counterpane"), a managed security monitoring service, in 1999.
3. I am a named inventor of United States Patent Nos. 7,159,237 and 7,895,641, both of which were initially assigned to Counterpane.
4. I understand that an issue in the above-captioned case is whether I would be available to testify at trial in the State of Delaware, if asked. I will make myself available to provide in-person trial testimony (if called) in the above-captioned case in the District of Delaware federal court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 15 day of March, 2023 in San Jose, California.



Andrew Gross